

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338-E) for Approval of its Charge Ready and Market Education Programs.

Application 14-10-014
(Filed October 30, 2014)

**DECISION GRANTING COMPENSATION TO
THE UTILITY REFORM NETWORK FOR SUBSTANTIAL
CONTRIBUTION TO DECISION 16-01-023**

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| Intervenor: The Utility Reform Network | For contribution to Decision (D.) 16-01-023 |
| Claimed: \$64,527.84 | Awarded: \$63,636.72 (reduced 1.4%) |
| Assigned Commissioner: Carla J. Peterman | Assigned ALJ: Darwin E. Farrar |

PART I: PROCEDURAL ISSUES

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| A. Brief description of Decision: | This decision modifies and adopts the terms of the joint party Proposed Settlement regarding Southern California Edison Company's (SCE) application for its Charge Ready and Market Education Programs. The Decisions authorizes SCE to collect \$22 million in revenue requirement to implement the Phase 1 pilot electric vehicle charging infrastructure program. This decision modifies the Proposed Settlement terms governing the rebate amount, reporting requirements, cost management, regulatory and transition processes, and load management. |
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

| | Intervenor | CPUC Verified |
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| Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)): | | |
| 1. Date of Prehearing Conference (PHC): | February 2, 2015 | Verified. |
| 2. Other specified date for NOI: | N/A | |
| 3. Date NOI filed: | March 3, 2015 | Verified. |

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| 4. Was the NOI timely filed? | | Yes, The Utility Reform Network (TURN) timely filed the notice of intent to claim intervenor compensation. |
| Showing of customer or customer-related status (§ 1802(b)): | | |
| 5. Based on ALJ ruling issued in proceeding number: | R.14-05-001 | Verified. |
| 6. Date of ALJ ruling: | September 5, 2014 | Verified. |
| 7. Based on another CPUC determination (specify): | See Comment #1 | |
| 8. Has the Intervenor demonstrated customer or customer-related status? | | Yes, TURN demonstrated appropriate status. |
| Showing of “significant financial hardship” (§ 1802(g)): | | |
| 9. Based on ALJ ruling issued in proceeding number: | R.14-05-001 | Verified. |
| 10. Date of ALJ ruling: | September 5, 2014 | Verified. |
| 11. Based on another CPUC determination (specify): | N/A | |
| 12. Has the Intervenor demonstrated significant financial hardship? | | Yes, TURN demonstrated a rebuttable presumption of significant financial hardship. |
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision: | D. 16-01-023 | Verified. |
| 14. Date of issuance of Final Order or Decision: | January 25, 2016 | Verified. |
| 15. File date of compensation request: | March 25, 2016 | Verified. |
| 16. Was the request for compensation timely? | | Yes, TURN timely filed the claim for intervenor compensation. |

C. Additional Comments on Part I:

| # | Intervenor’s Comment(s) | CPUC Discussion |
|---|---|---|
| 1 | <p>TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding. As explained in the Commission’s Intervenor Compensation guide, “normally, an ALJ Ruling need not be issued unless: (a) the NOI has requested a finding of “significant financial hardship” under § 1802(g). (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI.” (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN’s NOI.</p> | <p>Agreed, TURN satisfied the eligibility requirements for intervenor compensation.</p> |

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
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| <p>1. Settlement Outcomes TURN's efforts, in conjunction with those of ORA, resulted in a Settlement Agreement with SCE and a majority of parties that included significantly more ratepayer protections than SCE’s original proposal. The Commission modified limited provisions of the settlement agreement and adopted it in D.16-01-023.</p> | <p>- D.16-01-023: pp. 61-62, OP 2 & 3.</p> | <p>The Utility Reform Network’s representation of the terms of the settlement approved in D.16-01-023 is accurate and its description of its prior litigation positions is also accurate. Pursuant to (D.) 94-10-029, the Commission has discretion to award</p> |

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| <p>TURN played a key role in the settlement and successfully had a significant number of its proposals from testimony included in the settlement and adopted by the Commission. As can be inferred by reviewing SCE and TURN's opening testimony and comparing them to the settlement agreement, TURN's advocacy in the settlement process resulted in many key ratepayer protections being included in the settlement agreement, including:</p> <ul style="list-style-type: none"> • Requiring meaningful site host contributions to program costs • Data collection and reporting on the program's impact on EV adoption • Cost recovery of charging station rebates so that they are not included in rate base and subject to the utilities authorized rate of return • Differentiation of rebate levels based on location type • Requirement that a new regulatory process begin for Phase 2 of the program only after sufficient Phase 1 data has been collected, reported on, and analyzed <p>TURN participated actively in all aspects of the process that lead to the Commission's modification and adoption of</p> | <p>- See TURN-01, Borden Testimony, May 15, 2015 & TURN-02, Jones Testimony, May 15, 2015.</p> <p>- See Also, SCE-01, Volume 02, October 30, 2014.</p> <p>- Settlement Agreement, July 9, 2015, p. 7.</p> <p>- TURN-01, Borden Testimony, p. 20.</p> <p>- Settlement Agreement, July 9, 2015, p. 8 & Appendix A.</p> <p>- TURN-01, Borden Testimony, p. 18.</p> <p>- Settlement Agreement, July 9, 2015, p. 8.</p> <p>- TURN-02, Jones Testimony, pp. 6 – 7.</p> <p>- Settlement Agreement, July 9, 2015, p. 7.</p> <p>- TURN-01, Borden Testimony, p. 21-22.</p> <p>- Settlement Agreement, July 9, 2015, p. 9.</p> <p>- TURN-01, Borden Testimony, p. 15-17.</p> | <p>compensation to parties who participated in settlement agreements, when there is a finding that they made a substantial contribution to a decision. We find that The Utility Reform Network's participation in the settlement made a substantial contribution to D.16-01-023.</p> |
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| <p>the Settlement Agreement in D.16-01-023, including taking the lead on most aspects of the consumer groups’ participation, including: meeting with ORA and working to develop consensus, developing strategy, drafting and editing proposed settlement terms, taking the lead for consumer groups negotiating terms, and advocating for the Settlement Agreement once submitted to the Commission.</p> | <p>- D.16-01-023, p. 3, FN 1.</p> | |
| <p>2. Settlement Provisions adopted in Final Decision</p> <p>The Settlement Agreement includes the following key components that were adopted in D.16-01-023:</p> <ul style="list-style-type: none"> - SCE provides program participants with the “make-ready stub” and all supporting infrastructure for the installation of electric vehicle (EV) charging stations. - SCE provides customers with rebates that cover a portion of the costs of purchasing EV charging stations. The rebate levels vary based on the location type/market segment. - SCE will form an Advisory Board that will review and provide input, guidance, and suggestions on the implementation and improvement of the Charge Ready Program. The Advisory Board will include representatives from a diverse array of key constituents. - SCE will provide quarterly reports on the progress of the program and will file and serve | <p>- D.16-01-023, p. 11 & p. 52, FOF 8.</p> <p>- TURN-01, Borden Testimony, p. 19.</p> <p>- D.16-01-023, p. 15.</p> <p>- TURN-01, Borden Testimony, p. 20.</p> <p>- D. 16-01-023, pp. 20.</p> | <p>Verified.</p> |

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| <p>a pilot report to provide Phase 1 data and recommend any necessary changes to Phase 2 after at least 1,000 charging station installations.</p> | <ul style="list-style-type: none"> - D. 16-01-023, pp. 19-20. - TURN-01, Borden Testimony, May 15, 2015, pp. 17-19. | |
| <p>3. Rebate Cost Recovery</p> <p>TURN researched and analyzed the proper cost recovery treatment for the charging station rebates. SCE proposed to treat the rebates as regulatory assets and include the costs of the rebates in rate base, which TURN opposed in testimony based on the fact that the rebates are for equipment SCE will not own or operate. Instead, TURN proposed that the rebates be treated as expenses. As a result of TURN’s advocacy, the settlement agreement treated the rebates as expenses. The Commission adopted this settlement provision and referenced Mr. Jones’ testimony. D.16-01-023 requires SCE to treat the rebates as expenses, to be recovered from ratepayers in the year in which they are incurred and not treated as a regulatory asset and included in rate base.</p> | <ul style="list-style-type: none"> - TURN-02, Jones Testimony, pp. 3 – 8. - TURN-02, Jones Testimony, p. 4. - D. 16-01-023, pp. 19-20. - D. 16-01-023, p. 56, COL 12. | <p>Verified.</p> |
| <p>4. Rebate Levels</p> <p>In Testimony TURN opposed rebates and proposed that SCE limit ratepayer funding to the make-ready stub, which will still result in a significant subsidy of approximately 70% of the capital cost. The Commission found merit in</p> | <ul style="list-style-type: none"> - TURN-01, Borden Testimony, May 15, 2015, pp. 19-20. - D.16-01-023, pp. 11-12. | <p>Verified.</p> |

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| <p>TURN’s arguments and decreased the rebate levels that were included in the settlement so that site hosts would be required to make a larger contribution.</p> <p>In testimony TURN proposed that the program focus on multi-unit dwellings (MUDs) because they are an underserved market and access to home charging is necessary for EV adoption. The Commission agreed with this rationale and adopted larger rebate levels for MUDs to encourage more program participation in that market segment.</p> | <p>- TURN-01, Borden Testimony, May 15, 2015, pp. 20-21.</p> <p>- D.16-01-023, pp. 8-9 & 17.</p> | |
| <p>5. Regulatory Process and Transition</p> <p>SCE originally submitted an application for both phases of the Charge Ready program and proposed a seamless transition between the two phases. In Testimony, TURN proposed that SCE amend and re-file the Phase 2 portion of its testimony after Phase 1 is completed. TURN argued that it was necessary to collect sufficient Phase 1 data to inform Phase 2, and that the parties have sufficient time to analyze and incorporate any Phase 1 data in their recommendations for Phase 2. The settlement agreement requested that the Commission set a prehearing conference to begin regulatory review of Phase 2 once SCE has filed its pilot report, after at least 9 months of program</p> | <p>D. 16-01-023, p. 28.</p> <p>- TURN-01, Borden Testimony, May 15, 2015, pp. 15-16.</p> <p>- TURN-01, Borden Testimony, May 15, 2015, pp. 16-17.</p> <p>- D.16-01-023, p. 29.</p> | <p>Verified.</p> |

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| <p>implementation. Referencing TURN’s testimony, the Commission determined that 9 months of data may not be sufficient and modified the proposed settlement to require SCE to file a pilot report after at least 12 months of data and the installation of 1,000 charging stations before filing a new application for Phase 2 of the program.</p> | <p>- D.16-01-023, p. 24 & p. 23. FN 51.</p> <p>- D.16-01-023, p. 31.</p> | |
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

| | Intervenor’s Assertion | CPUC Discussion |
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| <p>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹</p> | <p>Yes</p> | <p>Verified.</p> |
| <p>b. Were there other parties to the proceeding with positions similar to yours?</p> | <p>Yes</p> | <p>Verified.</p> |
| <p>c. If so, provide name of other parties: Office of Ratepayer Advocates</p> | | <p>Yes.</p> |
| <p>d. Intervenor’s claim of non-duplication: TURN worked diligently to avoid duplication with other like-minded intervenors by devoting minimal time to issues that were addressed by other intervenors. TURN coordinated with other intervenors as appropriate (i.e. when there would be savings in the overall time devoted to the case) but also took positions adverse to ORA and other intervenors on some issues.</p> <p>TURN took the lead in many aspects of settlement negotiations on behalf of consumer groups, including: working with ORA to achieve consensus where possible before approaching SCE to discuss key policies to be included in the settlement agreement; drafting documents used during negotiations; and playing a coordination role among the Settling Parties throughout settlement negotiations.</p> <p>For all of these reasons, TURN submits that there was no undue duplication between TURN’s participation and that of ORA and the other intervenors.</p> | | <p>Agreed, TURN did not engage in duplicative participation.</p> |

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

| | <u>CPUC Discussion</u> |
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| <p>a. Intervenor’s claim of cost reasonableness:</p> <p>TURN’s request for intervenor compensation seeks an award of approximately \$64,500 as the reasonable cost of our participation in the proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed and the benefits to customers.</p> <p>TURN’s advocacy, reflected in D.16-01-023, primarily addressed policy and process matters rather than specific rates or disputes over particular dollar amounts. The focus of TURN’s advocacy was to structure the Charge Ready pilot program so that it would be successful and deliver benefits to ratepayers.</p> <p>TURN played a key role in the settlement negotiations and many of TURN’s proposals from testimony were included in the proposed settlement and were adopted by the Commission. TURN was able to reduce ratepayer costs of the program by 1) increasing the amount site hosts pay to participate in the program and 2) by negotiating a cost recovery mechanism for the charging station rebates that is more advantageous for ratepayers.</p> <p>In sum, the Commission should conclude that TURN’s overall request is reasonable given the issues at stake in the proceeding and the adopted outcomes.</p> | <p>Verified.</p> |
| <p>b. Reasonableness of hours claimed:</p> <p>This Request for Compensation includes approximately 160 total hours for TURN’s attorney time and 140 hours for TURN’s expert witnesses. TURN submits that this is a reasonable amount of time, given the breadth of issues addressed in TURN’s testimony, the duration of settlement negotiations and the leading role played by TURN throughout that process.</p> <p><u>Reasonableness of Staffing</u></p> <p>The legal, policy and technical issues addressed in this proceeding were complex and, in some instances, required time by different TURN attorneys and experts due to the unique expertise held by different individuals. Given the critical role played by TURN in achieving the settlement, the Commission should find that the number of hours claimed for each of its experts and attorneys is fully reasonable.</p> <p><u>Attorney Hours:</u></p> <p>TURN’s primary attorney was Elise Torres, assisted by Marcel Hawiger, who oversaw other electric vehicles infrastructure proceedings before Elise</p> | <p>Verified, <i>but see</i> CPUC Disallowances and Adjustments, below.</p> |

Torres joined TURN. The staffing of this proceeding was consistent with Ms. Torres joining TURN shortly before the start of this proceeding, warranting a senior attorney working with her at key stages in the proceeding. TURN's primary attorney only sought advice from another senior attorney, Bob Finkelstein, who is very familiar with cost recovery issues, on very limited occasions.

Expert Witness Hours:

Garrick Jones

TURN retained the services of Garrick Jones of JBS Energy to prepare testimony on the cost impacts of SCE's proposal to provide rebates for charging stations and regulatory asset treatment for rebate cost recovery. Mr. Jones has extensive experience in utility ratemaking and cost recovery and has submitted testimonies on multiple occasions on these issues before this Commission. Mr. Jones has over 7 years of experience consulting in the energy field, and his resume is attached to Exhibit TURN-02 in the record of this proceeding.

Mr. Jones analyzed SCE's cost forecasts and provided technical assistance regarding cost reductions and cost impacts. Mr. Jones also sponsored expert testimony regarding SCE's cost recovery and rebate capitalization proposals.

Eric Borden

TURN's internal Energy Analyst, Eric Borden, was TURN's primary expert for this proceeding. Mr. Borden researched and prepared testimony on a variety of key issues in the proceeding including:

- Need for rebates
- Rebate Amounts and differentiation of rebate levels based on location type/market segment
- Data collection and reporting requirements
- Regulatory process and "bridge" period between Phase 1 & Phase 2
- Barriers to EV adoption
- Review of E3 Cost Effectiveness Analysis
- Potential risks to ratepayers from program

Mr. Borden has seven years of professional experience in the energy sector. This case represented his second time submitting testimony in front of this Commission. Mr. Borden's resume is attached to exhibit TURN-01 in the record of this proceeding and is also included as Attachment 4 to this compensation request because the Commission has not previously established an hourly rate for Mr. Borden.

Coordination among staff and presence of multiple TURN attorneys or

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| <p><u>experts at meetings:</u> A relatively small percentage of hours reflect internal and external meetings involving two or more of TURN’s attorneys and/or expert witnesses. The Commission should recognize such meetings do not reflect internal duplication, but rather are essential to effective and efficient coverage of a large litigation case that involves multiple issues.</p> <p>There are a limited number of hours devoted to internal planning meetings. Such meetings are essential to the effective development and implementation of TURN’s strategy in these cases. Strategy planning meetings with multiple staff are essential, as each staff member contributes particular knowledge and expertise to develop complex case strategy that require a certain amount of “group-think.” Furthermore, in a large proceeding with multiple issues such as this proceeding, TURN sometimes assigns more than one attorney to cover different issues, both to maximize the use of attorneys with particular expertise and for basic workload management. Some internal coordination is then necessary to ensure proper coverage and allocate responsibilities. Such a process is overall more efficient and effective than having a single attorney cover the entire proceeding on issues that are less familiar to the attorney.</p> <p>Similarly, there are a limited number of hours for external meetings involving multiple TURN staff, including instances where more than one member of TURN’s staff attended settlement negotiations. The Commission should understand that this is often essential when different attorneys are covering different issues, since a particular meeting likely covers multiple issues. TURN’s requested hours do not include any for a TURN attorney or expert witness where his or her presence at a meeting was not necessary in order to achieve the meeting’s purpose. TURN submits that such meetings can be part of an intervenor’s effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor’s advocacy efforts.</p> <p><u>Compensation Request</u> TURN’s request also includes 9.25 hours devoted to the preparation of compensation-related filings. The time devoted to preparing this compensation request is appropriate given the robustness of the evidentiary record in this proceeding and should be found to be reasonable.</p> | |
| <p>c. Allocation of hours by issue: This proceeding addressed several policy issues related to the proper structure and implementation of SCE’s Charge Ready program. Attorney and expert consultant time was allocated both by issue as well as activities. Certain work activities, such as participation in settlement negotiations (including settlement meetings, reviewing settlement documents, drafting</p> | <p>Verified.</p> |

settlement documents) cannot be allocated by issue due to confidentiality restrictions, and are thus coded as “sett. or settlement.”

TURN uses a combination of activity and issue codes when itemizing the hourly work performed by attorneys and expert consultants. The main activity codes used for time accounting in this proceeding include the following:

GP – 57 hours – 19% of total

General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing SCE’s application and testimony, the Scoping Memo, AC Rulings, party motions, etc. TURN also includes in this category time devoted to attending and preparing for the PHC and time reviewing the proposed decision (PD) and alternate proposed decision (APD).

Coord. – 8.75 hours – 3% of total

These include the limited amount of time TURN spent discussing the proceeding with ORA and determining which issues TURN and ORA would each focus on to minimize duplication. Also includes limited hours meeting with other intervenors to discuss concerns regarding SCE’s application and the motion to consolidate.

– 37 hours – 12% of total

Work covering multiple issues that cannot be easily segregated. Including some work preparing testimony and reviewing/editing testimony, preparing TURN’s PHC statement, and work reviewing and analyzing settling parties’ comments on PD and APD. Also includes time spent at hearings on proposed settlement.

Costs – 24 hours – 8% of total

Work related to researching and analyzing the reasonableness of the costs of the Charge Ready program and SCE’s cost effectiveness analysis.

Cost Recovery – 40 hours – 14% of total

Work researching and analyzing appropriateness of SCE’s cost recovery proposal for charging station rebates.

Rebates – 27 hours – 9% of total

Work researching and analyzing the appropriate rebate levels for different market segments and location types and developing TURN’s rebate proposal.

Research – 30 hours – 10% of total

Includes time spent reviewing past commission decisions and other reports

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| <p>relevant to the proceeding.</p> <p>Discovery – 35 hours – 12% of total Includes TURN’s expert witness time preparing data requests and TURN attorney time reviewing and finalizing data requests.</p> <p>Sett. or Settlement – 38 hours - 13% of total Attending and participating in settlement negotiations. Also includes work preparing for settlement meetings, including the review of proposals, associated research and analysis, and the preparation of term sheets.</p> <p>COMP – 8.5 hours Work preparing TURN’s notice of intent to claim compensation and final request for compensation and supporting documents.</p> <p>Some of the daily work in this proceeding spanned multiple issues and could not be separately coded by issue. TURN generally used the activity code “#” to denote work that covers multiple issues and cannot be easily allocated to specific issues.</p> <p>Some work is fundamental to active participation in a Commission proceeding, and may not be allocable by issue and/or the amount of time required may not vary by the number of issues. Examples of these tasks include reviewing other parties’ testimony and filings, reviewing the proposed and any alternate decision; attending prehearing conferences and ex parte meetings. TURN uses the activity code “GP” to represent such general participation time that is not allocable by issue.</p> <p>As TURN described in the opening section of this compensation request, our substantial contribution to the Commission’s decision was of such magnitude and so wide ranging that it warrants an award of full compensation. However, should the Commission determine that a reduction is called for on any particular issue, it should determine the appropriate reduction to the hours that fall into that category and, if necessary, apply an appropriate percentage reduction to the hours designated “#.”</p> | |
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B. Specific Claim:*

| CLAIMED | | | | | | CPUC AWARD | | |
|-------------------------------------|------|-------|---------|-----------------|----------|------------|---------|----------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |

| Elise Torres | 2014 | 20.5 | \$215 | See Comment 1 | \$4,407.50 | 19.00 | \$215 ² | \$4,085.00 |
|---|------|--------|---------|--|-------------|------------------------------|--------------------|-------------|
| Elise Torres | 2015 | 118.75 | \$215 | See Comment 1 | \$25,531.25 | 117.13 | \$215 | \$25,182.95 |
| Elise Torres | 2016 | 2.25 | \$215 | See Comment 1 | \$483.75 | 2.25 | \$215 | \$483.75 |
| Marcel Hawiger | 2014 | .75 | \$410 | D.15-06-021, p. 28; D.15-08-023, p. 24 | \$307.5 | 0.75 | \$410.00 | \$307.50 |
| Marcel Hawiger | 2015 | 17.5 | \$410 | D.15-06-021, p. 28; D.15-08-023, p. 24 | \$7,175 | 17.50 | \$410.00 | \$7,175.00 |
| Bob Finkelstein | 2015 | .75 | \$505 | D.15-08-023, p. 24 | \$378.75 | 0.75 | \$505.00 | \$412.50 |
| Eric Borden | 2015 | 73 | \$180 | See Comment 2 | \$13,140 | 73.00 | \$180.00 | \$13,140.00 |
| Garrick Jones | 2014 | 15.25 | \$180 | D.15-11-019, p.19. | \$2,745.00 | 11.25 | \$180.00 | \$2,025.00 |
| Garrick Jones | 2015 | 50.81 | \$185 | Consistent with 2% increase for 2013 from Res. ALJ-287, plus 2.56% for 2014 from Res. ALJ-303, rounded to nearest \$5. | \$9,399.85 | 54.81 [2] | \$180.00 [3] | \$9,865.80 |
| Subtotal: \$63,568.60 | | | | | | Subtotal: \$62,677.50 | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |
| Elise | 2015 | 3.25 | \$107.5 | @ 50% of \$215 | \$349.38 | 3.25 | \$107.50 | \$349.37 |

² Decision (D.) 16-04-037 adopted the rate of \$215 per hour for Torres. We apply this newly adopted rate here for Torres' work in this proceeding.

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| Torres | | | 0 | | | | | |
| Elise Torres | 2016 | 5.25 | \$107.50 | @ 50% of \$215 | \$564.38 | 5.25 | \$107.50 | \$564.37 |
| Subtotal: \$ 913.76 | | | | | | Subtotal: \$913.74 | | |
| COSTS | | | | | | | | |
| # | Item | Detail | | | Amount | Amount | | |
| 1 | Copies | Copying of pleadings for ALJ and Commissioner Offices | | | \$32.10 | \$32.10 | | |
| 2 | Postage | Postage for pleadings to CPUC | | | \$10.01 | \$10.01 | | |
| 3 | Phone | Phone bill for calls or conference calls necessary for proceeding | | | \$3.37 | \$3.37 | | |
| Subtotal: \$45.48 | | | | | | Subtotal: \$45.48 | | |
| TOTAL REQUEST: \$64,527.84 | | | | | | TOTAL AWARD: \$63,636.72 | | |
| ATTORNEY INFORMATION | | | | | | | | |
| Attorney | | Date Admitted to CA BAR³ | | Member Number | | Actions Affecting Eligibility (Yes/No?) | | |
| Elise Torres | | December 9, 2011 | | 280443 | | No, but inactive from 1/28/13 until 1/1/14. | | |
| Marcel Hawiger | | January 23, 1998 | | 194244 | | No. | | |
| Bob Finkelstein | | June 13, 1990 | | 146391 | | No. | | |

C. Intervenor's Comments on Part III:

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| Comment # | Intervenor's Comment(s) |
| Comment 1 | <p>2014 and 2015 Hourly Rates for Elise Torres</p> <p>TURN's request for Ms. Torres' hourly rate for 2015 is pending before the Commission in the following compensation requests: A.12-08-007, filed on October 27, 2015; R.13-12-011, filed on November 24, 2015; and R.14-12-014, filed on March 21, 2016.</p> <p>TURN anticipates the rate to be set in a compensation award shortly but if the Commission would like, TURN can provide a supplemental response to this request.</p> <p>2016 Hourly Rate for Elise Torres</p> |

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

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| | <p>For 2016 hours (primarily for compensation-related work), TURN is also requesting compensation using the rate authorized for 2015. TURN requests that the requested rate NOT be deemed the adopted rate for Ms. Torres for 2016, as TURN may seek a higher 2016 rate for her work in future requests for compensation.</p> |
| <p>Comment 2</p> | <p>2015 Hourly Rates for Eric Borden</p> <p>Mr. Borden’s complete resume is attached as Attachment 4 to this compensation request. Mr. Borden holds a Bachelor of Science in Finance and a Master of Public Affairs, specializing in Natural Resources and the Environment. Mr. Borden spent three years in the field of litigation consulting, conducting financial and accounting modeling and writing reports supporting expert witnesses in disputes over intellectual property and energy utilities. During graduate school, Mr. Borden conducted academic research on electric vehicle policy, and worked professionally conducting research on renewable energy costs, clean energy technologies and social entrepreneurship. TURN submits that his work experience during this period should be deemed the equivalent of one fully year of additional professional experience for purposes here. Mr. Borden was then awarded a German Chancellor Fellowship to conduct research on renewable energy integration and energy storage in Germany, lasting for about 1.5 years. Subsequently, Mr. Borden worked for 1.5 years as an energy analyst with a consulting firm analyzing the financial profitability of Combined Heat and Power systems in different utility jurisdictions, and as a consultant with the International Renewable Energy Agency writing a report on the use of battery storage for renewable integration.</p> <p>In sum, when he joined TURN in February 2015, Mr. Borden had the equivalent of seven years of professional experience in financial modeling, utility tariff analysis, and research and publications on topics in the energy field. Given the length and direct relevance of his professional experience to the issues before the Commission, TURN requests that the Commission authorize an hourly rate of \$180/hour for 2015 for Mr. Borden. Such a rate is near the bottom of the 2015 range for 7-12 years of experience (\$170-\$285) (and just above the mid-point of the \$140-\$200 range established for consultants with 0-6 years experience). It is comparable to hourly rates adopted for experts with similar training and experience (for example: Heather Cooley for Surfrider Foundation -- \$175 for 2009 work in D.11-05-017; Michael Brown for Small Business Utility Advocates -- \$185 for 2013 work in D.15-06-016.. TURN submits that \$180 is a reasonable hourly rate for an expert of Mr. Borden’s experience. Even if the Commission calculates his relevant experience differently to reach a lower figure, the requested rate is well within the \$140-\$200 range established for consultants with 0-6 years experience. The Commission should find reasonable the requested hourly rate of \$180.</p> |

D. CPUC Disallowances and Adjustments:

| Item | Reason |
|------|--|
| [1] | The Commission does not compensate attorneys for work that is clerical in nature, as |

| | |
|-----|--|
| | compensation for such work has been factored into the approved hourly rates. The Commission disallows the following hours as clerical: .875 hours on 12/5/14; .625 hours on 12/15/14; 1 hour on 1/26/15; and .625 hours on 3/2/15. |
| [2] | Jones' timesheet reflects 11.25 hours claimed in 2014 and 54.81 hours claimed in 2015. |
| [3] | The Commission did not adopt a cost-of-living adjustment for 2015. Jones' rate remains unchanged from the rate set in 2014. |

PART IV: OPPOSITIONS AND COMMENTS

| | |
|--|------|
| A. Opposition: Did any party oppose the Claim? | No. |
| B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))? | Yes. |

FINDINGS OF FACT

1. TURN has made a substantial contribution to D.16-01-023.
2. The requested hourly rates for TURN's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$63,636.72.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$63,636.72.
2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay The Utility Reform Network (TURN) the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 8, 2016, the 75th day after the filing of TURN's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at Sacramento, California.

APPENDIX

Compensation Decision Summary Information

| | | | |
|----------------------------------|------------------------------------|---------------------------|----|
| Compensation Decision: | | Modifies Decision? | No |
| Contribution Decision(s): | D1601023 | | |
| Proceeding(s): | A1410014 | | |
| Author: | ALJ Farrar | | |
| Payer(s): | Southern California Edison Company | | |

Intervenor Information

| Intervenor | Claim Date | Amount Requested | Amount Awarded | Multiplier? | Reason Change/Disallowance |
|-----------------------------------|-------------------|-------------------------|-----------------------|--------------------|---|
| The Utility Reform Network (TURN) | 3/25/2016 | \$64,527.84 | \$63,636.72 | N/A | <i>See CPUC Disallowances and Adjustments, above.</i> |

Advocate Information

| First Name | Last Name | Type | Intervenor | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|-------------------|------------------|-------------|-------------------|-----------------------------|----------------------------------|---------------------------|
| Elise | Torres | Attorney | TURN | \$215.00 | 2014 | \$215.00 |
| Elise | Torres | Attorney | TURN | \$215.00 | 2015 | \$215.00 |
| Elise | Torres | Attorney | TURN | \$215.00 | 2016 | \$215.00 |
| Marcel | Hawiger | Attorney | TURN | \$410.00 | 2014 | \$410.00 |
| Marcel | Hawiger | Attorney | TURN | \$410.00 | 2015 | \$410.00 |
| Robert | Finkelstein | Attorney | TURN | \$505.00 | 2015 | \$505.00 |
| Garick | Jones | Expert | TURN | \$180.00 | 2014 | \$180.00 |
| Garick | Jones | Expert | TURN | \$185.00 | 2015 | \$180.00 |
| Eric | Borden | Expert | TURN | \$180.00 | 2015 | \$180.00 |

(END APPENDIX)